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December 22, 2022

**VIA ECF**

Hon. Denise L. Cote, U.S.D.J.  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: Liberty Insurance Corporation v. New York Marine and General Insurance Company, American Empire Surplus Lines Insurance Company, and Hudson Excess Insurance Company**  
**Civil Action No. : 1:22-cv-01081-DLC**

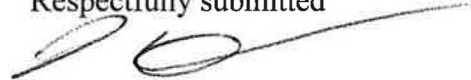
Dear Judge Cote:

Our firm represents plaintiff Liberty Insurance Corporation ("Liberty") in the referenced matter. We submit this letter motion, pursuant to paragraph 1.E. of Your Honor's Individual Practices in Civil Cases, for a 20-day extension of time to file the parties' Joint Pretrial Order in this matter, such that the new deadline to file is extended to February 16, 2023. The current deadline to file the Joint Pretrial Order, pursuant to Your Honor's Order dated October 27, 2022 (Document 50) is January 27, 2023. All parties consent and join in this request.

This extension of time is requested because for number of factors, including that the Joint Pretrial Order is taking more time than anticipated to prepare, a flu that hit our office, and our holiday schedule. The parties need more time to negotiate and draft a concise and clear order. The parties have been working through the issues in good faith.

The requested extension does not affect any other scheduled dates. We thank the Court for its patience and time in this matter.

Respectfully submitted



Marshall T. Potashner

FL-fl

cc: William F. Stewart, Esq. (via ECF)  
Nancy Zangrilli, Esq. (via ECF)  
Daniel F. McFaul, Jr., Esq. (via ECF)  
Michael Panayotou, Esq. (via ECF)

Granted. There will be no further extensions.

12/22/22

CALIFORNIA

FLORIDA



DENISE COTE  
United States District Judge